



# Code of Ethics and Conduct

**KEPLERWEBER®**  
CONNECTING GENERATIONS

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# Message from the CEO

"In 2025, Kepler Weber celebrates 100 years of history. A century marked by achievements, transformations, and, above all, fidelity to the principles that guide every step of our journey. Among them, integrity remains a non-negotiable value that is present in our way of being, in our relationships, and in the solutions we deliver to the market.

Together with safety, respect, and excellence, integrity is at the basis of our commitment to shareholders, employees, customers, partners, and society. Every member of Kepler Weber is a guardian of these values, reflecting them in their daily actions and decisions.

This Code of Ethics and Conduct was created to guide our actions and strengthen an ethical culture across the organization. It is an individual and collective commitment to a responsible and transparent conduct aligned with our principles.

We know that the path to integrity requires constant attention, active listening, and the courage to act in situations that pose risks or opportunities for improvement. Therefore, we encourage you to use the available channels to clarify doubts, report concerns, and contribute to an increasingly honest and safe environment.

We remain steadfast in building an even better Kepler Weber. We count on your commitment to honor this legacy and, together, prepare for the next 100 years with ethics, responsibility, and pride in what we represent."

*Bernardo Osborn Gomes Nogueira*  
CEO

# 1. Presentation

Kepler Weber (“Kepler Weber” or the “Company”), founded in 1925, has become a leader in post-harvest storage solutions in South America, thanks to the entrepreneurial vision of its founders and the innovative capacity of its team.

Throughout its history, the Company has based its actions on solid ethical principles and values, which are shared by managers, employees and shareholders, showing a strong commitment to integrity, social and environmental responsibility, and corporate governance, always valuing relationships of trust and respect with its stakeholders.

Kepler Weber has established its Integrity Program to prevent, detect, and correct harmful acts under Law No. 12.846/2013. In addition to establish anti-bribery measures, the program also reduces the risk of fraud in bidding processes and in agreements entered into with the public and private sectors in Brazil and abroad, committed by employees or third parties in their own interest or benefit. It also aims to prevent, detect, and punish harmful acts committed by legal entities against the Company.

The Integrity Program is aligned with Kepler Weber’s mission, vision and values, and contributes to the promotion of good management practices within an honest, ethical and transparent corporate environment.

**Thus, Kepler Weber’s Code of Ethics and Conduct consolidates the main ethical principles that guide the Company’s business and defines the expectations of conduct for managers, employees, third parties and business partners in the performance of their daily activities.**

## 2. Mission, Vision and Values

### MISSION

To offer differentiated and innovative post-harvest solutions, generating value for customers, shareholders, business partners, employees and the community.

### VISION

To be a global benchmark in the post-harvest market, a leader in Latin America, with differentiated and innovative products and services.

### VALUES



Respect



Excellence



Integrity



Security

### *3. Who this code applies to*

**This Code of Ethics and Conduct applies to all individuals acting on behalf of Kepler Weber, or in partnership with the Company and its subsidiaries.**

It refers to all employees (regardless of their function, employment status, or hierarchical position), as well as officers, directors, customers, suppliers, partners, service providers, and the society in general.

Everyone is responsible for acting in accordance with this Code, promoting its dissemination, understanding and internalization as part of Kepler Weber's organizational culture.

## *4. General principles*

Kepler Weber is convinced that achieving its goals with professionalism and commitment requires acting ethically, correctly, and transparently with its employees, shareholders, customers, suppliers, service providers, partners, and the society. The Company is committed to following the principles and guidelines set forth in this Code, as well as the applicable laws and regulations, especially those prohibiting corrupt practices.

Kepler Weber's business conduct is guided by respect for people, social responsibility, professional development and business integrity, where the respect for human dignity and promotion of diversity are non-negotiable principles.



## The Company:

- Actively contributes to the development and well-being of the society in which it operates, encouraging citizenship.
- Is committed to complying with current laws, rules, regulations and policies in an ethical and honest manner.
- Operates with respect and protection for the environment, complying with the environmental legislation and reducing the impact that its actions may have on it, besides promoting environmental preservation and awareness actions.

- Competes fairly and loyally, complying with all antitrust and competition laws and regulations of the countries where it operates.
- Is firmly committed to the health and safety of its employees, customers, suppliers, partners and all persons who are on our premises to provide services or use our products.

## Kepler Weber does not tolerate:

- Child labor, forced labor, degrading labor, unhealthy labor or labor analogous to slavery, under any circumstances, both in its operations, in its controlled companies, or in the companies of its suppliers or business partners.
- Any form of discrimination, whether economic, social, political, philosophical, religious, based on sexual orientation, ethnicity, gender, age, marital status, race, health condition, physical or mental disability, permanent or temporary physical characteristics, nationality or any other reason.
- Moral harassment through words, behaviors, gestures or attitudes that may harm a person's dignity, physical or psychological integrity, threaten their employment or degrade the work environment.
- Sexual harassment or any constraint with the intention of obtaining sexual advantage or favors, including when there is abuse of hierarchical position or influence.
- Corruption and any other form of getting illicit or immoral advantages.
- Fraud, embezzlement, misappropriation or unauthorized use of the Company's assets, resources or information, and those of its customers, suppliers or business partners.

## 5. Senior management commitment

For Kepler Weber's Senior Management, conducting business ethically, with integrity and transparency is a non-negotiable commitment of everyone at the Company to its customers, shareholders, partners, suppliers, and society. Kepler Weber's boards, committees, executive board, and other senior management members support the Integrity Program and the provisions of this Code of Ethics and Conduct, ensuring effective compliance with its provisions through the ongoing commitment of Senior Management.

### Senior Management also reinforces its commitment to:

- Promoting and committing to an ethical and honest conduct that strengthens the Company's relationship with all its **stakeholders**.
- Prioritizing people management principles that promote the development, well-being and satisfaction of everyone at Kepler Weber.
- Protecting the confidentiality of strategic and sensitive information of the Company, its customers and shareholders, obtained or created as a result of its activities, and preventing the unauthorized disclosure of such information, unless required by the applicable laws, regulations or legal process.
- Producing complete, legitimate, accurate, timely and understandable corporate reports and documents to be sent or presented to shareholders and regulatory bodies, in addition to other communications made by the Company.
- Avoiding any conduct that, directly or indirectly, has a fraudulent, coercive, or manipulative influence on shareholders with the purpose of generating misleading financial statements.

## 6. Relationships

**Kepler Weber values and promotes honest, ethical, and transparent relationships with all parties with whom it interacts. See below some examples of types of ethical conduct expected in these interactions:**

### Kepler Weber is committed to:

- Encouraging the employees' active participation in their own development, providing the necessary conditions for this.
- Creating a collaborative work environment, based on everyone's engagement, participation, and dedication.
- Fostering an entrepreneurial spirit and a sense of individual and collective responsibility for results.
- Conducting objective and transparent selection processes, based exclusively on the skills, abilities and merits of applicants, respecting equal opportunities and non-discrimination.
- Maintaining employment relationships in strict compliance with the current legislation, not allowing any form of irregular work.
- Ensuring that compensation, benefits and awards comply with Company policies, the legislation and labor agreements.
- Conducting termination processes with respect and dignity.
- Encouraging all employees, regardless of hierarchical level, to report risky or dangerous situations, ensuring the adoption of preventive and corrective measures, without fear of retaliation.

#### 6.1 – Relationship with employees

Our Company's relationship with its employees is based on trust, dialogue, cordiality and mutual respect.



## Employees must:

- Act with integrity and good faith in the performance of their duties and in fulfilling other obligations arising from this Code of Ethics and Conduct and other standards.
- Always act in accordance with the Code of Ethics and Conduct, whether when acting internally or when representing Kepler Weber.
- Present standards of conduct that reflect their personal and professional integrity, in a manner compatible with Kepler Weber's values and with society.
- Report, through the channels provided by Kepler Weber, any risk to the integrity of the business, image, reputation or assets of the Company, acting preventively.
- Protect the Company's assets and resources, using them responsibly and for professional purposes. Examples of assets and resources include: facilities, equipment, vehicles, systems, corporate email, telephone services, software, office supplies etc.
- Must not obtain undue personal advantages, benefits or privileges from any stakeholder (suppliers, business partners, customers, among others) of Kepler Weber due to the employee's position in the Company.
- Represent the Company before external audiences, the press and in social media only if he/she has been previously and expressly authorized to do so, ensuring the Company's image and reputation in all its activities.
- Carry out activities in accordance with the provisions of the employment agreement. Performing parallel activities, such as selling products and/or providing services, during working hours and on the Company's premises is prohibited.
- Protect their own health and safety, as well as that of colleagues and third parties, strictly complying with all applicable golden rules, standards, procedures and guidelines.
- Contribute to a respectful, inclusive work environment free from any form of harassment, discrimination, or intimidation, promoting diversity and the well-being of all.

Promoting an ethical culture is everyone's responsibility, with special emphasis on managers, who must act as examples and multipliers of the Company's values.

## 6.2 – Relationship with shareholders

The relationship with shareholders must be based on an accurate, transparent and timely communication, so as to allow them to monitor the Company's activities and performance, always respecting the principle of equity in the conduct and handling of the Company's information.

Kepler Weber adopts a Corporate Governance system that complies with the legislation and transparency standards established by regulatory bodies applicable to publicly traded companies. The Company is committed to providing shareholders with:

- Accurate, complete and timely financial and business information.
- Transparency, equity, integrity and independence in the disclosure of information.
- Effective risk management, with robust internal controls.
- Protection of the interests of all shareholders, including minority shareholders.
- Prudent use of financial resources, aiming at security and profitability.

**Furthermore, shareholders are also expected to conduct their activities with ethics and integrity, both in relation to Kepler Weber and other companies in which they hold interest.**

For more information, see the **Policy on Disclosure of Material Acts or Facts and the Securities Trading Policy.**

## 6.3 – Relationship with customers

Kepler Weber conducts business with its customers with ethics, integrity, and transparency, with the mission of generating value and fostering lasting relationships based on mutual trust. To this end, the Company is committed to:

- Fully complying with signed contracts and agreements, respecting the conditions and obligations assumed.
- Respecting customer rights and ensuring quality services, focusing on agreed priorities and exceeding expectations, always striving for full satisfaction and building long-term partnerships.
- Providing products and services tailored to customer needs and use, based on rigorous standards of quality, safety and reliability.
- Acting with transparency in communication, providing clear, complete and accessible information about our products, services and conditions.
- Handling complaints and suggestions seriously and quickly, using them as opportunities for continuous improvement and enhancement of processes.
- Promoting active listening and close relationships, seeking to understand customers' needs in order to anticipate solutions and offer personalized support.

## 6.4 – Relationship with suppliers and business partners

Kepler Weber establishes relationships with suppliers, service providers and business partners based on ethics, transparency, social and environmental responsibility, and integrity.

Kepler Weber's suppliers, service providers and business partners must commit to:

- Decent working conditions for their employees and throughout the supply chain;
- Health and safety at the workplace;
- Respect for the environment, with sustainable practices and in compliance with environmental legislation;
- Compliance with national and international anti-corruption laws;
- Transparency regarding potential conflicts of interest that could compromise their performance or the impartiality of the Company's employees.

Kepler Weber adopts social, environmental, and integrity criteria for selecting, approving, and maintaining suppliers, in line with best corporate governance practices.

### Kepler Weber is committed to:

- Encouraging long-lasting relationships of mutual trust with suppliers and partners.
- Hiring only reputable suppliers and service providers who meet their legal obligations, the established requirements, and who comply with the service instructions that govern this practice.
- Carrying out procurement and contracting processes for products and/or services with transparency, fairness and security, respecting intellectual property rights and the confidentiality of own and third-party data.

## 6.5 – Relationship with competitors

Kepler Weber is committed to conducting business ethically, always considering fair competition, and respecting the competition and antitrust laws of all countries in which it operates.

Any information about its competitors and business environment must be obtained ethically and within the limits defined by law.

Kepler Weber repudiates unfair or unlawful practices, such as defamation, dissemination of untruths and slander, sabotage, industrial espionage, theft of documents, data or intellectual property, or any other illicit or unethical act that may compromise the integrity of competition.

Kepler Weber believes that free competition, when exercised responsibly and with integrity, contributes to the sustainable development of the sector and the generation of value for all stakeholders.

## 6.6 – Relationship with related parties

Employees must ensure transparency, integrity and balance in the relationships between Kepler Weber Group companies and other subsidiaries, and the information exchanged among them must be accurate, timely and truthful, respecting the principles of good governance.

Transactions with related parties must follow the guidelines established in the **Policy on Transactions with Related Parties**, and managers must ensure the optimization of benefits to the Company, with a focus on generating sustainable value, seeking conditions equal to or better than those of the market, adjusted for the risk factors involved.

Transactions with related parties must be conducted in strict compliance with the **Policy on the Prevention of Conflicts of Interest**. All employees must act impartially, ensuring that their decisions are not influenced by personal interests or those of third parties. Detecting, reporting, and managing potential conflicts of interest, as detailed in the specific policy, is each individual's responsibility to protect the Company's reputation and assets.

Employees are not allowed to get any type of income, compensation, or personal benefit involving equity interest or arising from their professional activity, whether directly or indirectly, that may constitute a conflict of interest with the Company's objectives and/or operations. This prohibition aims to ensure impartiality in decisions, protect corporate integrity, and ensure that all business with Related Parties are conducted in the best interest of the Company, as established in the **Policy on the Prevention of Conflicts of Interest**.

## 6.7 – Relationship with society

Kepler Weber is committed to the communities in which it operates, promoting the values of solidarity, empathy, altruism, and volunteering among its employees, encouraging the development of responsible citizens and respecting local principles, traditions, and needs.

The Company maintains an open and purposeful dialogue with society, communicating information of collective and general interest in a transparent, appropriate and timely manner.

Kepler Weber carries out various social responsibility initiatives and prioritizes social, cultural, and environmental projects aligned with sustainable development in its donations, sponsorships, and philanthropic initiatives.

For more information on this topic, see the [Social Investment Policy](#).

## 6.8 – Relacionamento com agentes públicos

Kepler Weber repudiates any act that may undermine public administration, whether national or foreign, and strongly condemns the payment of bribes, corruption or any illegal practice in the countries where it operates or maintains commercial relations.

The Company establishes that all meetings with government officials must be held with the presence of at least two duly authorized employees, and with the necessary prior approvals and records.

### According to this Code of Ethics and Conduct, it is expressly prohibited to:

- Promise, offer or grant, directly or indirectly, undue advantages to government officials or persons related to them.
- Finance, fund, sponsor or in any way subsidize the practice of illegal acts.
- Use intermediaries, whether individuals or legal entities, to conceal or disguise real interests, or the identity of beneficiaries of the acts performed.
- Promise, offer or grant money, valuables, giveaways, gifts, or any type of advantage (financial or non-financial), voluntarily or upon request, to any government official, politically exposed persons, or third parties related to them, in exchange for personal or corporate benefits.
- Hinder investigations or inspections conducted by public bodies, regulatory agencies or control entities, including within the national financial system.
- Prevent, disrupt or defraud bidding processes.
- Get undue advantages in the amendments to or extension of agreements with the public administration.
- Manipulate or defraud the economic-financial balance of contracts signed with public authorities.

Kepler Weber does not make, allow, promote, or encourage any type of donation, contribution, or financing to political parties, candidates, or electoral campaigns, whether through financial resources, assignment of assets, spaces, products, or any other type of support.

## 7. Anti-corruption

Kepler Weber has an **Anti-Corruption and Anti-Bribery Policy** whose objective is to establish and consolidate internal standards and rules that ensure effective preventive practices against corporate corruption. This policy reinforces the Company's commitment to the principles and guidelines established in this Code of Ethics and Conduct.

All reports on non-compliance with ethical standards or suspected corruption are handled as a priority and duly investigated, as Kepler Weber does not tolerate any form of corruption, bribery, extortion, kickbacks, fraud, money laundering, terrorist financing or other illegal acts.

Kepler Weber believes that combating corruption must take place daily, on multiple fronts, and with the commitment of all members of the organization. To guide its executives, employees, business partners, third parties, and customers on best practices on this topic, Kepler Weber provides the **Anti-Corruption Handbook**, a document that is part of the Code of Ethics and Conduct and complements the Company's **Anti-Corruption and Anti-Bribery Policy**.

Everyone is expected to refer to the indicated documents and commit to safeguarding Kepler Weber's reputation and integrity.

## 8. *Conflict of interest*

A conflict of interest is any situation in which the personal interests of an employee, executive officer, director, supplier, service provider or business partner are, or may become, against the interests of the Company, compromising his/her impartiality, independence or ability to make decisions in the best interest of the Company.

### Typical conflict of interest situations include, among others:

- Relatives or people with emotional ties working in the same area, or in areas with related activities;
- Personal relationship with individuals who work for suppliers, customers, competitors or public bodies with which the Company has contracts, or who perform inspection, regulatory or authorization functions.

In all cases involving conflicts of interest or situations that may appear to be conflicts of interest, those involved must immediately and formally report the situation to the Integrity Committee, as provided for in this Code and the **Policy on the Prevention of Conflicts of Interest**. Each case will be analyzed individually, based on the principles of transparency, ethics, and integrity.

It is prohibited for employees, executive officers, directors, and employees of suppliers, service providers or business partners to voluntarily submit to, or remain aware of, a situation of conflict of interest without reporting it to the Company.

### The obligations of Kepler Weber employees are:

- Always act in the best interest of the Company, in accordance with the Policy of Related Party Transactions, available on Kepler Weber's Investor Relations website ([ri.kepler.com.br](http://ri.kepler.com.br)).
- To declare annually, and whenever a new situation arises, any potential or actual conflict of interest relating to their activities.
- Carefully analyze situations that may constitute a conflict of interest, even if only in appearance.
- Immediately inform managers whenever a personal activity may interfere or conflict with the Company's interests, clarifying its nature and extent.
- To refrain from selling products or services on the Company's premises, regardless of the time.

The hiring of employees' family members is permitted, provided there is no privilege in relation to any position, compensation or benefits, and that the selection process has been conducted in a fair and transparent manner, with equal conditions for all applicants.

Statutory managers and directors are not allowed to hire direct relatives in any area of the Company. Employees are responsible for informing their immediate superior, the People & Management department, or the Legal, Governance & Compliance Department, whenever they identify a potential or actual conflict of interest.

For more information on this topic, see the **Policy on the Prevention of Conflicts of Interest**.

## 9. Giveaways, gifts and hospitality

Kepler Weber employees, executive officers and directors must not offer, give, request or receive any giveaways, gifts, hospitality or any other advantages (financial or non-financial) that could be understood as consideration for an illegal action, or that could influence decision-making, regardless of the amount involved, which constitutes an undue advantage.

Giveaways, gifts and hospitality are only permitted when they do not constitute undue advantage and, cumulatively, have a symbolic value and institutional nature, such as pens, notebooks and diaries with a company logo, and when they have been offered or received as a courtesy of a customary commercial nature.

It is prohibited to offer and/or receive giveaways, gifts, hospitality or any other advantages (financial or non-financial), regardless of the circumstances or amount involved, to/from a government official or politically exposed person.

Giveaways, gifts and hospitality received that are not considered institutional should be refused. If refusal is not possible, the item should be delivered to the Integrity Program management area (Legal, Governance & Compliance Department), which will conduct periodic drawings among the employees and notify the Company.

If you have any questions, please use our official communication channels. For more information on this topic, see the [Policy on Giveaways, Gifts and Hospitality](#).

## 10. Donations and sponsorships

Except for political donations and contributions, which are prohibited, as set out in the item *“Relationship with Public Agents”*, all other donations, sponsorships and contributions using Kepler Weber resources must:

- Comply with the **Policy on Donations and Sponsorships**;
- Be submitted to the Integrity Committee for approval, together with a favorable opinion from the relevant technical areas, and any promotions and financing of philanthropic, cultural, social or environmental projects must have a clear relationship with the Company's business or contribute to its value;

Donations to reputable and upright entities and institutions are permitted, motivated by legitimate philanthropic reasons and in support of humanitarian, cultural, sporting, educational causes, or causes related to the well-being of the communities where the Company operates, provided that they comply with the current policy.

**According to Kepler Weber guidelines, it is prohibited to:**

- Sponsor projects, events or materials of a political, religious, or discriminatory nature, or that violate the laws, regulations, this Code of Ethics and Conduct, or the Policy on Donations and Sponsorships;
- Offer or promise donations or sponsorships with the purpose of influencing, whether directly or indirectly, a business decision or obtain undue advantage, or influence the actions of any person, whether a government official, politically exposed person, supplier, third party, among others, regardless of the suitability of the organization favored.
- Make donations to or sponsor organizations in which the employees, or their first-degree relatives, hold equity interest and/or have management power, in order to avoid conflicts of interest.
- Make donations to or sponsor individuals or legal entities with restrictions on the National Registry of Unfit and Suspended Companies (“CEIS”); Registry of Prohibited Private Non-Profit Entities (“CEPIM”); the National Registry of Civil Convictions for Acts of Administrative Misconduct of the National Council of Justice; and the List of Disqualified and Unfit Persons of the Federal Court of Auditors.

For more information on this topic, see the **Policy on Donations and Sponsorships**.

## 11. Safety, health and environment

Kepler Weber reaffirms its commitment to the health and safety of its employees, customers, suppliers, the community, and other stakeholders. The Company promotes an organizational culture focused on risk awareness and adoption of preventive measures, in compliance with the current occupational health and safety legislation. It is everyone's responsibility to respect, comply with and disseminate health and safety standards, ensuring their own integrity and that of others.

Kepler Weber recognizes that the environment is a common good that is essential to quality of life and must be preserved for the future generations. Based on this principle, the Company seeks to minimize the environmental impacts of its activities.

**The commitments made and the actions carried out by Kepler Weber are oriented towards social responsibility and aim to:**

- Fully comply with environmental legislation, at the Federal, State and Municipal levels, seeking, whenever possible, to exceed established legal standards.
- Develop and encourage pollution prevention programs, acting directly on the generating sources.
- Promote environmental conservation through continuous improvement of processes, aligned with the principles of sustainable development.
- Reduce, reuse and recycle industrial waste, whenever technically feasible.
- Ensure appropriate and continuous environmental performance in the treatments carried out, with responsibility and transparency.
- Promote and encourage the education and training of its employees, and influence all its stakeholders on Health, Safety and Environment issues.

## 12. Transparency

Kepler Weber is committed to promoting and valuing transparency in employment relationships, ensuring freedom of expression and the accuracy of information provided, always respecting the confidentiality of information and materials. Kepler Weber uses internal communication mechanisms to ensure employee involvement in the Company's management, as well as to provide the information required for performance of its activities and for understanding corporate guidelines.

Kepler Weber also adopts external communication practices aimed at building quality relationships with stakeholders. Through appropriate channels, we promote the exchange of information, requests, and suggestions, fostering active listening and the continuous improvement of the Company's internal processes.

In order to reinforce our commitment to transparency, several documents of public interest are available on the institutional website ([www.kepler.com.br](http://www.kepler.com.br)), such as our Sustainability Report, this Code of Ethics and Conduct, and the access to the Ethics Channel.

## 13. Sensitive, privileged or confidential information

The employees, controlling shareholders (direct or indirect), members of the Board of Directors, Executive Board, Fiscal Council, committees and any bodies with technical or advisory functions, created by statutory provision, as well as any person who, by reason of their position, function or role in the Company, its parent company, subsidiaries or affiliates, has access to information related to material acts or facts, or to confidential materials, must:

- Follow the **Policy on the Disclosure of Relevant Acts or Facts**, available on the Company's Investor Relations website ([ri.kepler.com.br](http://ri.kepler.com.br)).
- Maintain confidentiality regarding the Company's business, protecting any information not yet disclosed to the market, as well as third-party information obtained in the exercise of their functions.
- Report to the responsible authorities any violation, or suspected violation, of the duty of secrecy, confidentiality, or misuse of privileged information.

### The employees, managers, directors and shareholders are not allowed to:

- Carry out purchase, sale or any other transaction using privileged information, in transactions for one's own benefit or that of third parties.
- Inform, influence, recommend or induce third parties, based on privileged information, to carry out transactions for their own benefit or that of third parties.
- Spreading false information, rumors or hearsay, or carrying out transactions with the intention of manipulating the prices of listed financial instruments.

## 14. *Information technology*

All employees, executive officers and directors are responsible for using information technology resources responsibly, and in compliance with applicable laws, the Company's internal policies, applicable procedures, and ethical standards, integrity, and good customs.

Using the Company's technology resources for personal or unauthorized purposes is prohibited, as is any practice that may compromise information security, data confidentiality, or system integrity.

Everyone should adopt good digital security practices, such as using strong passwords, locking devices when not in use, and being alert to attempts at electronic fraud, such as phishing and social engineering. Suspected incidents should be immediately reported to the Information Technology department.

The Company promotes awareness-raising activities and periodic training on the safe and ethical use of technology, and it expects the engagement of all internal stakeholders.

## *15. Preservation of personal data privacy*

Kepler Weber values and promotes a culture of Privacy and Personal Data Protection, committing to the ethical and responsible treatment of information of its employees, executive officers, directors, customers, suppliers, partners and the society in general.

Kepler Weber aims to protect personal data for specific and legitimate purposes, in accordance with the applicable legislation, especially the General Personal Data Protection Law (Law No. 13.709/2018).

“Personal data” means any information related to an identified or identifiable natural person, such as full name, email address, and CPF [Individual Taxpayers Register Number], as well as data that, together, may lead to the identification of an individual, such as geolocation and date of birth.

Kepler Weber, as the Personal Data Controller, collects, uses and shares this information only with the knowledge and consent of the Data Subject, except when there is a legal or contractual basis that authorizes processing it without consent.

Internal access to personal data is limited to employees who need this information to perform their duties. Those with this access must handle personal data responsibly by respecting the principles of purpose, necessity, and appropriateness.

The guidelines established in the **Policy on Privacy and Personal Data Protection** and the **Information Security Policy** must be followed, especially in activities involving the use, storage, transmission or disposal of personal data. For more information, see the **Policy on Privacy and Personal Data Protection** and the **Information Security Policy**, available on the Company's internal channels.

### 15.1 – Data privacy protection channel

Kepler Weber provides the **LGPD Channel**, which is intended for receiving and managing requests relating to privacy and protection of personal data, as provided for in the General Personal Data Protection Law (Law No. 13.709/2018).

This channel is under the responsibility of the Data Protection Officer (DPO), being available to all data subjects, including employees, customers, suppliers, partners and other interested parties.

**Requests can be made through the website:**

<https://titulares.becompliance.com/webforms/648618ba-4932-4231-8acc-0647bd111b11/b3dd3002-613a-4572-9f38-1b14e2482bd7>

## *16. Illicit substances, alcohol and smoking products*

The use, possession, distribution or sale of illicit substances and/or alcoholic beverages at the Company's premises, as well as in any activity related to Kepler Weber during working hours, is expressly prohibited. It is also prohibited to be under influence of these substances while performing professional activities, regardless of the location in which they are being carried out.

Furthermore, the use of smoking products, such as cigarettes, electronic cigarettes and similar products, is prohibited in closed environments or in places not intended for this purpose, in accordance with the current legislation and the Company's internal policies.

## 17. Integrity program management

The responsibility for managing the Integrity Program and maintaining the Code of Ethics and Conduct lies with the Legal, Governance & Compliance Department, which is responsible for the program's communication, continuous updating, and dissemination of the highest standards of ethical conduct at Kepler Weber.

To ensure the confidentiality of whistleblowers and reduce potential conflicts of interest, complaints are received by a third-party company, guaranteeing the independence of the process and the integrity of investigations.

After receiving a complaint through the Ethics Channel, the outsourced company analyzes the content and the individuals involved, and forwards the case to the Integrity Committee. When necessary, the referral will be made on an extraordinary basis, without sharing the complaint with potentially conflicting members. The Integrity Committee may contact whistleblowers through the Ethics Channel for further clarification.

The Integrity Committee is made up of members with expertise in strategic management, administration, corporate governance, and compliance. Its role, among others, is to conduct the investigation and/or review of complaints, and apply the Code of Ethics and Conduct in situations involving ethical and behavioral values, including cases of violation by employees.

The Disciplinary Committee is responsible for deciding on disciplinary measures for reports classified as "High Risk." Reports classified as valid or partially valid by the Integrity Committee, after investigation and in compliance with the risk classification, will be forwarded to the Disciplinary Committee for appropriate action.

In the event of a conflict of interest involving members of the Disciplinary Committee, the decision on disciplinary measures will be assigned to the Advisory Committee of the Board of Directors, to which the Integrity Committee is subordinate. If necessary, the case may be escalated to the Board of Directors.

The Legal, Governance & Compliance Department employees do not perform operational functions, nor report to any of Kepler Weber's operational departments. This structure ensures the independence, impartiality, and authority necessary to perform their duties, with access to adequate material, human, and financial resources, as well as the ability to report to the Company's highest hierarchical level.

### The Integrity Commission's responsibilities are to:

- Contribute to updating the Code of Ethics and Conduct and other internal regulations related to ethics and conduct.
- Ensure the confidentiality of the information processed, including the confidentiality of complaints, preserving the rights of those involved and the impartiality of decisions.
- Promote periodic training on the content of the Code of Ethics and Conduct, and control the attendance.
- Analyze and forward all complaints received through the Ethics Channel, ensuring confidentiality and anonymity when requested, and report its conclusions to the People, Compliance and Sustainability Committee.
- Ensure that, in cases involving members of the Legal, Governance & Compliance Department or the Integrity Committee, those involved will not have access to the complaint records.
- Decide on the application of disciplinary measures relating to complaints that are valid or partially valid, classified as "Low Risk" or "Medium Risk".
- Forward the results of the investigations and recommendations regarding the complaints that are valid or partially valid, and classified as "High Risk" to the Disciplinary Committee.
- Report, when requested by the Chief Executive Officer or the Chairman of the Board of Directors, on the status of the cases analyzed.

### The Disciplinary Committee's responsibilities are to:

- Act as an advisory body in complaints classified as "High Risk", supporting the Integrity Committee in the decision on opening an investigation and in subsequent actions.
- Resolve on disciplinary measures applicable to complaints that are valid or partially valid, and classified as "High Risk".
- Escalate to the Board of Directors for joint resolution in cases involving members of the Board of Directors' Advisory Committees or the Company's Executive Board.

**The Advisory Committee linked to the Board of Directors, to which the Disciplinary Committee is subordinate, has its routines and procedures defined in Internal Regulations approved by the Board itself.**

## 18. NON-COMPLIANCE WITH THE CODE OF ETHICS AND CONDUCT

The Violation of any principles and prohibitions established in this Code of Ethics and Conduct will subjects the employees, managers or directors to the following sanctions and disciplinary measures:

- Verbal warning;
- Written warning;
- Suspension;
- Dismissal without cause;
- Dismissal for cause;
- Dismissal from the governance body of which he/she is a member;
- Exclusion of donations or sponsorship made by the Company; and
- Adoption of the appropriate legal measures.

Sanctions and disciplinary measures will be decided by the Integrity Committee and the Disciplinary Committee of Kepler Weber, based on the principles of proportionality, gradualness and immediacy, being applied:

- (i) by the immediate superior, another hierarchical superior or the area manager; or
- (ii) by the Advisory Committee of the Board of Directors to which the Disciplinary Committee is linked, in cases involving the chairperson or other members of the Board of Directors.

In the case of suppliers, service providers and partners, the applicable sanctions and disciplinary measures are as follows:

- Formal warning or extrajudicial notice;
- Replacement of the third-party offender in the provision of services to Kepler Weber;
- Contractual fine;
- Contract termination; and
- Impossibility of new hiring, in cases where the contract is no longer valid;
- Exclusion of donation or sponsorship made by the Company.

Sanctions and disciplinary measures applied to suppliers, service providers and partners will be decided by the Legal, Governance & Compliance Department areas, and by the area that manages the contract, the latter being responsible for their application.

For more information, see the [Policy on Penalties and Consequences](#).

## 19. Ethics channel

It is the responsibility of all employees, regardless of their role or hierarchical position, executive officers, directors, customers, service providers, suppliers, business partners, and other stakeholders, to report violations or potential violations of this Code, other internal Company rules, or any applicable laws or regulations.

Reports can be made anonymously through the Ethics Channel, which is available:



**On the website:** <https://www.contatoseguro.com.br/keplerweber>



**By phone:** 0800 648 6328

We recommend that reports of possible misconduct contain the following information:

- (i)** who is involved in the case, and if there are any witnesses;
- (ii)** how, when, where;
- (iii)** evidence that may contribute to the investigation of the complaint, if possible.

The Ethics Channel provides tracking of the report status through a protocol number, but due to the confidentiality of the process, the results are not shared. It is also possible to report possible violations directly to the Integrity Committee or to the Legal, Governance & Compliance Department.

All complaints received will be treated confidentially and with secrecy, guaranteeing anonymity to those who request it.

**For more information, see the Ethics Channel Policy.**

### **19.1 – Commitment to non-retaliation against whistleblowers**

The Ethics Channel is designed to receive complaints and reports of violations of the Code of Ethics and Conduct, internal regulations and current legislation, guaranteeing confidentiality, anonymity and non-retaliation to whistleblowers.

To protect those who report inappropriate behavior, Kepler Weber does not tolerate any form of retaliation. No whistleblower may be subject to disciplinary action, harassment, transfer against their will, denial of promotion, or any form of discrimination due to a report made in good faith. Disciplinary actions may be applied regardless of the hierarchical level of the employees who retaliate or attempt to retaliate against whistleblowers, as well as for false allegations made in bad faith. The whistleblower is responsible for the accuracy of the information provided.

**Should any of the aforementioned situations occur, the Company must be notified immediately, so that appropriate action can be taken.**

## *20. Training programs*

Kepler Weber provides periodic training for all its employees, managers, executive officers and directors, with the aim of reinforcing the importance of complying with the guidelines established in this Code of Ethics and Conduct.

Participation in these trainings is mandatory, and attendance is recorded and monitored by the Legal, Governance & Compliance Department, as part of the Company's commitment to integrity, transparency and regulatory compliance.

## *21. Approval and disclosure of the code of ethics and conduct, questions and suggestions*

It is the responsibility of all Company employees to disseminate this Code of Ethics and Conduct, keep it accessible to all interested audiences, and raise awareness among those involved about the importance of its observance, also encouraging the submission of questions, suggestions or concerns regarding its application.

Although the guidelines established here allow us to assess most everyday corporate situations, doubts may arise about the most appropriate conduct to adopt in certain cases. For further clarification, we recommend referring to the internal policies available on the Kepler Weber intranet or website. If you have any questions, the Legal, Governance & Compliance Department or the Integrity Committee can be contacted through the official channels or directly for review and a response to the requester.

This Code of Ethics and Conduct was reviewed and approved by the Board of Directors of Kepler Weber on August 26, 2025. All other rules and regulations of the Company that do not conflict with this Code of Ethics and Conduct remain in force.

## *22. Instrument of commitment*

All Kepler Weber employees, managers, executive officers, directors, suppliers, service providers and business partners are responsible for knowing, accepting, respecting and spreading the guidelines established in this Code of Ethics and Conduct, as well as ensuring their strict compliance.

Furthermore, they must remain vigilant in preventing and detecting potential violations, promptly reporting them to the Legal, Governance & Compliance Department, the Integrity Committee and/or the Ethics Channel.

# *Employee Commitment Instrument*

I, [name and qualification], [function or position], declare that I have read and understood the provisions contained in the **Kepler Weber Code of Ethics and Conduct** revised on August 26, 2025, which incorporates the conduct expected from me in performing my duties, as well as the provisions of Law No. 12.846/13 (Anti-Corruption Law), with regard to the relationship with Public Authorities.

I further declare that I have received a copy of this Code of Ethics and Conduct, either in hard copy or digital format, available on the Kepler Weber website and/or the “Be Compliance” platform. By signing this document, I agree to fully comply with the guidelines set forth herein.

I undertake to respect all the principles, rules and values described in the Code, as well as the documents linked to it, applying them in the performance of my professional activities.

Finally, I declare that in case of doubt or knowledge of violations of this Kepler Weber Code of Ethics and Conduct, or Law No. 12.846/13 (Anti-Corruption Law), I will immediately communicate the issue to the Integrity Committee, either directly or through the Ethics Channel.

(City), month, day, year

Name: \_\_\_\_\_

Position: \_\_\_\_\_

Signature: \_\_\_\_\_

# *Instrument of Commitment Suppliers*

I, as legal representative of (company name), registered with CNPJ [Corporate Taxpayers Register] under No. [CNPJ], declare that I have read and understood the provisions contained in the **Kepler Weber Code of Ethics and Conduct** revised on August 26, 2025, which incorporates the conduct expected from me in this commercial relationship, as well as the provisions of Law No. 12.846/13 (Anti-Corruption Law), with regard to the relationship with Public Authorities.

I further declare that I have received a copy of this Code of Ethics and Conduct, either as a contractual exhibit, or digitally via the supplier portal. By signing this instrument, I undertake to fully comply with the guidelines established herein.

I undertake to respect all the principles, rules and values described in the Code, applying them in the performance of activities related to this commercial partnership.

Finally, I declare that in case of doubt or knowledge of violations of the Kepler Weber Code of Ethics and Conduct, or Law No. 12.846/13, I will immediately notify Kepler Weber through the Ethics Channel.

(City), month, day, year

Name: \_\_\_\_\_

Position: \_\_\_\_\_

Signature: \_\_\_\_\_

